

February 15, 2021

Via ECF

The Honorable Loretta A. Preska,
United States District Court for the Southern District of New York,
500 Pearl Street,
New York, NY 10007.

Re: *Petersen Energía Inversora S.A.U., et al. v. Argentine Republic and YPF S.A.*, No. 15 Civ. 2739 (LAP) (“*Petersen*”); *Eton Park Cap. Mgmt. et al. v. Argentine Republic and YPF S.A.*, No. 16 Civ. 8569 (LAP) (“*Eton Park*”)

Dear Judge Preska:

We write on behalf of Defendants the Republic of Argentina and YPF S.A., and Burford Capital LLC (“Burford”) in connection with the Court’s prior orders (*Petersen* ECF Nos. 220, 251, 258; *Eton Park* ECF No. 159, 191, 196) and our January 29, 2021 letter (*Petersen* ECF No. 273; *Eton Park* ECF No. 211) to provide a further status report regarding discovery as to Burford.

The parties are continuing to negotiate searches intended to capture documents responsive to Defendants’ outstanding requests and certain aspects of the scope of Burford’s response. To date, Burford has produced approximately 700 documents, comprising 2,737 pages. Burford is in the process of reviewing approximately 80,000 documents and currently expects to substantially complete its production by March 5, 2021, subject to the resolution of certain open issues.

In light of the continued discussions and Burford’s ongoing production, Defendants and Burford propose to provide a further status report to the Court on these issues by March 12, 2021.

Respectfully,

/s/ Robert J. Giuffra, Jr.

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The Honorable Loretta A. Preska

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cc: Counsel of Record